

BellSouth Telecommunications, Inc.

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December 1, 2003

VIA HAND DELIVERY

Hon. Deborah Taylor Tate, Chairman Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, Tennessee 37238

In Re:

Sprint-United Tariff 2003-710 to Introduce Safe and Sound II

Solution

Docket No. 03-00442

Dear Chairman Tate:

Enclosed are the original and fourteen copies of BellSouth's Response to Petition of AT&T Communications of the South Central States to Convene Contested Case and to Intervene. Copies of the enclosed are being provided to counsel of record.

Jøelle J. Phillips

JJP/mrd

BEFORE THE TENNESSEE REGULATORY AUTHORITY
Nashville, Tennessee

In Re:

Sprint-United Tariff 2003-710 to Introduce Safe and Sound II

Solution

Docket No. 03-00442

BellSouth's Response to Petition of AT&T Communications of the South

Central States to Convene Contested Case and to Intervene

BellSouth has no objection to the intervention of AT&T in the abovereferenced docket, provided that AT&T's participation does not unduly delay resolution of the issues in this docket.¹

AT&T chose to file its intervention after the period for the filing of briefs regarding the resale issue in this docket had already expired. Consequently, AT&T's decision to wait to intervene until after the deadline for filing of briefs should not be permitted to slow the progress of this matter. Counsel for BellSouth has conferred with counsel for AT&T to inquire whether AT&T intended to seek the opportunity to file its own brief regarding resale. Based on that conversation, it is BellSouth's understanding that AT&T does not presently intend to seek additional time or delay in order to file a brief on those issues.

To the extent that AT&T's Petition also seeks that a contested case proceeding be opened, such relief is most given that a contested case was convened prior to AT&T's filing. Moreover, AT&T's Petition to convene a contested case was not filed within the time requirements established by TRA rules for the convening of a contested case.

Time is of the essence for BellSouth with respect to this proceeding. While this proceeding does not involve a BellSouth tariff, the Authority has indicated its preference to defer ruling on BellSouth's Integrated Solutions and Wireless Answers tariffs until after a resolution of this docket has been achieved. For this reason, BellSouth respectfully submits that it is particularly important that the intervention of AT&T, or any other party, not be permitted to delay resolution of this docket

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.

Guy W. Hicks

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CERTIFICATE OF SERVICE

I hereby certify that on **December 1, 2003**, a copy of the foregoing document was served on the parties of record, via the method indicated:

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